

# EXHIBIT C

**From:** [Derek Wood](#)  
**To:** [Cohen, Justin S \(DFW - X61211\)](#)  
**Cc:** [Sandra Taylor](#); [Michael Johnson](#); [Bustamante, Bryan J \(DFW - X61364\)](#); [McKenney, Dina W \(DFW - X61757\)](#)  
**Subject:** Re: Purdue v. STMicropoena  
**Date:** Thursday, September 8, 2022 1:08:59 PM

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*[External email]*

Hi Justin. The Shore Firm is making the production. This is common in Rembrandt's experience (i.e., Rembrandt production managed by the law firm who represents a litigant who Rembrandt had discussions with under an NDA). In any event, I believe Rembrandt provided Shore with 126 non-privileged emails and there will be 16 emails on a privilege log that Shore will provide. I believe there are also 15 non-email electronic documents (including drafts and final NDA) that Rembrandt provided to Shore. Hope this answers your questions.

Thanks,  
Derek

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**From:** Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>  
**Sent:** Thursday, September 8, 2022 1:51 PM  
**To:** Derek Wood  
**Cc:** Sandra Taylor; Michael Johnson; Bustamante, Bryan J (DFW - X61364); McKenzie, Dina W (DFW - X61757)  
**Subject:** RE: Purdue v. STMicropoena

Derek - thank you for the update. The plan to send all docs to Purdue to produce to us is a little unorthodox. We want to avoid disputes and uncertainty about Rembrandt's production. We would prefer for Rembrandt's production to come directly from you. If that's not possible, when we would appreciate an inventory of what Rembrandt is providing to Purdue so we can verify that we are receiving all of the documents. Also, is Rembrandt withholding anything on the basis of privilege? If so, we request a privilege log.

Thank you,

~Justin

**Justin S. Cohen | Holland & Knight**  
Direct 214.969.1211 | Cell 214.605.1993  
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**From:** Derek Wood <wood@rembrandtip.com>  
**Sent:** Wednesday, September 7, 2022 4:41 PM  
**To:** Bustamante, Bryan J (DFW - X61364) <Bryan.Bustamante@hklaw.com>; Cohen, Justin S (DFW - X61211) <Justin.Cohen@hklaw.com>  
**Cc:** Sandra Taylor <Taylor@rembrandtip.com>; Michael Johnson <Johnson@rembrandtip.com>  
**Subject:** Re: Purdue v. STMicropoena

*[External email]*

Hi Justin,

Please see the attached submitted on behalf of Rembrandt. I'm sure you'll agree this is just standard practice, but let me know if you want to discuss anything.

We remain on schedule for the production, which will be made by the Shore Firm.

Regards,

Derek

215-275-3438

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**From:** Derek Wood

**Sent:** Wednesday, September 7, 2022 1:12 PM

**To:** Bustamante, Bryan J (DFW - X61364); Cohen, Justin S (DFW - X61211)

**Cc:** Sandra Taylor; Michael Johnson

**Subject:** Re: Purdue v. STMicromed subpoena

Hi Justin and Bryan,

Just a quick update. Rembrandt needs to coordinate with Purdue on any production, so we've been sending responsive docs to the Shore Firm who, I understand, will facilitate production to you this week. I will describe the methodology used as we get closer to production in the next day or so.

Regards,

Derek

215-275-3438

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**From:** Derek Wood

**Sent:** Friday, September 2, 2022 4:10 PM

**To:** Bustamante, Bryan J (DFW - X61364); Cohen, Justin S (DFW - X61211)

**Cc:** Sandra Taylor; Michael Johnson

**Subject:** Re: Purdue v. STMicromed subpoena

Thanks Bryan (and Justin). We'll be in touch as we get closer to production and appreciate the offer for assistance.

Regards,

Derek

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**From:** Bustamante, Bryan J (DFW - X61364) <[Bryan.Bustamante@hklaw.com](mailto:Bryan.Bustamante@hklaw.com)>  
**Sent:** Friday, September 2, 2022 3:55 PM  
**To:** Cohen, Justin S (DFW - X61211); Derek Wood  
**Cc:** Sandra Taylor; Michael Johnson  
**Subject:** RE: Purdue v. STMicro subpoena

Hi Derek,

Your team can upload the files here:  
<https://tklaw.app.box.com/f/effc473bcfde4ff58289f585f8f4b5bf>.

Please let me know if you have any issues.

Thank you,

**Bryan Bustamante | Holland & Knight**

Paralegal

Holland & Knight LLP

One Arts Plaza, 1722 Routh Street, Suite 1500 | Dallas, Texas 75201

Phone 214.969.1364 | Fax 214.964.9501

[bryan.bustamante@hklaw.com](mailto:bryan.bustamante@hklaw.com) | [www.hklaw.com](http://www.hklaw.com)

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**From:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>  
**Sent:** Friday, September 2, 2022 2:53 PM  
**To:** Derek Wood <[wood@rembrandtip.com](mailto:wood@rembrandtip.com)>  
**Cc:** Sandra Taylor <[Taylor@rembrandtip.com](mailto:Taylor@rembrandtip.com)>; Michael Johnson <[Johnson@rembrandtip.com](mailto:Johnson@rembrandtip.com)>;  
Bustamante, Bryan J (DFW - X61364) <[Bryan.Bustamante@hklaw.com](mailto:Bryan.Bustamante@hklaw.com)>  
**Subject:** RE: Purdue v. STMicro subpoena

Thanks Derek - yes, we have one. Bryan (cc'd) can provide you an upload link. Let me know if you want to schedule a call to discuss before or after these docs are produced. If you and your team need any assistance on collecting and producing the documents or email, you can use our litigation support team as well.

Thank you, and have a good weekend.

~Justin

**Justin S. Cohen | Holland & Knight**

Direct 214.969.1211 | Cell 214.605.1993

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**From:** Derek Wood <[wood@rembrandtip.com](mailto:wood@rembrandtip.com)>  
**Sent:** Friday, September 2, 2022 2:47 PM  
**To:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>

**Cc:** Sandra Taylor <[Taylor@rembrandtip.com](mailto:Taylor@rembrandtip.com)>; Michael Johnson <[Johnson@rembrandtip.com](mailto:Johnson@rembrandtip.com)>; Bustamante, Bryan J (DFW - X61364) <[Bryan.Bustamante@hklaw.com](mailto:Bryan.Bustamante@hklaw.com)>

**Subject:** Re: Purdue v. STMicro subpoena

*[External email]*

Hi Justin,

Does Holland & Knight have a preferred secure system for file sharing? Rembrandt does not have many remaining personnel, and I'm hoping to leverage any tool you may have to make the production easier for them.

Overall, it seems there are less than 20 electronic docs (other than email). The email review is still underway, but it should be a manageable number (perhaps less than 100, but we're not sure yet).

I believe we are on schedule to provide these to you by next Friday (our agreed-upon deadline), but we first need to share the potential production with Michael Shore who will want to make a quick review. Hoping that happens Tues-Weds next week.

Look forward to your thoughts on the file sharing.

Regards,

Derek

215-275-3438

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**From:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>

**Sent:** Thursday, August 25, 2022 2:52 PM

**To:** Derek Wood

**Cc:** Sandra Taylor; Michael Johnson; Bustamante, Bryan J (DFW - X61364)

**Subject:** RE: Purdue v. STMicro subpoena

Sounds good. Do you have some time available on Wednesday?

**Justin S. Cohen | Holland & Knight**

Direct 214.969.1211 | Cell 214.605.1993

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**From:** Derek Wood <[wood@rembrandtip.com](mailto:wood@rembrandtip.com)>

**Sent:** Thursday, August 25, 2022 1:50 PM

**To:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>

**Cc:** Sandra Taylor <[Taylor@rembrandtip.com](mailto:Taylor@rembrandtip.com)>; Michael Johnson <[Johnson@rembrandtip.com](mailto:Johnson@rembrandtip.com)>;

Bustamante, Bryan J (DFW - X61364) <[Bryan.Bustamante@hklaw.com](mailto:Bryan.Bustamante@hklaw.com)>

**Subject:** Re: Purdue v. STMicro subpoena

*[External email]*

Thanks for forwarding this, Justin.

It was nice speaking with you as well. As discussed, let's consider touching base later next week as the document collection makes progress.

Regards,  
Derek

Derek Wood  
215-275-3438

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**From:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>  
**Sent:** Thursday, August 25, 2022 2:23 PM  
**To:** Derek Wood  
**Cc:** Sandra Taylor; Michael Johnson; Bustamante, Bryan J (DFW - X61364)  
**Subject:** RE: Purdue v. STMicro subpoena

Hi Derek - it was nice meeting you today. Thank you again for your time. Attached is the PO in our case. Please feel free to designate any materials Rembrandt finds accordingly. If you have any questions or would like to discuss the subpoena further, please don't hesitate to contact me.

Thank you,

~Justin

**Justin S. Cohen | Holland & Knight**  
Direct 214.969.1211 | Cell 214.605.1993  
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**From:** Cohen, Justin S (DFW - X61211)  
**Sent:** Wednesday, August 24, 2022 10:35 PM  
**To:** 'Derek Wood' <[wood@rembrandtip.com](mailto:wood@rembrandtip.com)>  
**Cc:** Sandra Taylor <[Taylor@rembrandtip.com](mailto:Taylor@rembrandtip.com)>; Michael Johnson <[Johnson@rembrandtip.com](mailto:Johnson@rembrandtip.com)>; Bustamante, Bryan J (DFW - X61364) <[Bryan.Bustamante@hklaw.com](mailto:Bryan.Bustamante@hklaw.com)>  
**Subject:** RE: Purdue v. STMicro subpoena

Hi Derek - that's no problem. I just sent a revised invite.

Thank you,

~Justin

**Justin S. Cohen | Holland & Knight**

Direct 214.969.1211 | Cell 214.605.1993

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**From:** Derek Wood <[wood@rembrandtip.com](mailto:wood@rembrandtip.com)>

**Sent:** Wednesday, August 24, 2022 2:40 PM

**To:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>

**Cc:** Sandra Taylor <[Taylor@rembrandtip.com](mailto:Taylor@rembrandtip.com)>; Michael Johnson <[Johnson@rembrandtip.com](mailto:Johnson@rembrandtip.com)>; Bustamante, Bryan J (DFW - X61364) <[Bryan.Bustamante@hklaw.com](mailto:Bryan.Bustamante@hklaw.com)>

**Subject:** Re: Purdue v. STMicrom subpoena

*[External email]*

Hi Justin,

My schedule has changed and I'm hoping we can move our call tomorrow. I'm sorry to do this. Would you be available at any of the following times tomorrow?

11:30AM Eastern

12:00PM Eastern

2:00PM Eastern

4:30PM Eastern

Thanks for understanding - sorry to do this.

Regards,

Derek

215-275-3438

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**From:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>

**Sent:** Wednesday, August 24, 2022 11:13 AM

**To:** Derek Wood

**Cc:** Sandra Taylor; Michael Johnson; Bustamante, Bryan J (DFW - X61364)

**Subject:** RE: Purdue v. STMicrom subpoena

Thank you Derek. 10:30 ET works for me. I'll send you a calendar invite.

Best,

~Justin

**Justin S. Cohen | Holland & Knight**

Direct 214.969.1211 | Cell 214.605.1993

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**From:** Derek Wood <[wood@rembrandtip.com](mailto:wood@rembrandtip.com)>

**Sent:** Monday, August 22, 2022 4:03 PM

**To:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>

**Cc:** Sandra Taylor <[Taylor@rembrandtip.com](mailto:Taylor@rembrandtip.com)>; Michael Johnson <[Johnson@rembrandtip.com](mailto:Johnson@rembrandtip.com)>; Bustamante, Bryan J (DFW - X61364) <[Bryan.Bustamante@hklaw.com](mailto:Bryan.Bustamante@hklaw.com)>

**Subject:** Re: Purdue v. STMicro subpoena

*[External email]*

Hi Justin - I'm pretty open on Thursday at the moment. How about 10:30 or 11AM Eastern?

Thanks,

Derek

215-275-3438

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**From:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>

**Sent:** Monday, August 22, 2022 2:07 PM

**To:** Derek Wood

**Cc:** Sandra Taylor; Michael Johnson; Bustamante, Bryan J (DFW - X61364)

**Subject:** RE: Purdue v. STMicro subpoena

Hi Derek - thank you for your email. I think a call to discuss would be very helpful. Unfortunately, I'm fairly booked this week, but have openings on Thursday and Friday. Please let me know some times that work for you and I'll send you a calendar invite.

Thank you,

~Justin

**Justin S. Cohen | Holland & Knight**

Direct 214.969.1211 | Cell 214.605.1993

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**From:** Derek Wood <[wood@rembrandtip.com](mailto:wood@rembrandtip.com)>

**Sent:** Monday, August 22, 2022 10:30 AM

**To:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>

**Cc:** Sandra Taylor <[Taylor@rembrandtip.com](mailto:Taylor@rembrandtip.com)>; Michael Johnson <[Johnson@rembrandtip.com](mailto:Johnson@rembrandtip.com)>; Bustamante, Bryan J (DFW - X61364) <[Bryan.Bustamante@hklaw.com](mailto:Bryan.Bustamante@hklaw.com)>

**Subject:** Re: Purdue v. STMicro subpoena

*[External email]*

Hi Justin,

Thanks for your voicemail and your email below. Rembrandt agrees to your offer of a three

week extension of the document production deadline. Rembrandt will be searching for documents this week and will let you know whether there are any concerns or unexpected reasons to seek a further extension.

Before Rembrandt gets to far into that process, I'm happy to discuss the scope of the subpoena (including the need for any deposition testimony). Do you have some time today or tomorrow?

Regards,  
Derek

Derek Wood  
215-275-3438

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**From:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>  
**Sent:** Friday, August 19, 2022 1:22 PM  
**To:** Derek Wood  
**Cc:** Sandra Taylor; Michael Johnson; Bustamante, Bryan J (DFW - X61364)  
**Subject:** RE: Purdue v. STMicro subpoena

Hi Derek - I'm sorry for not responding sooner. I'm currently out of town and had a deposition yesterday. Thank you very much for reaching out. ST can agree to a 3 week extension of the document production deadline. We can also agree to extend the deposition date until sometime later at a mutually-agreeable date/time/location.

Please let me know if you would like to schedule a call to discuss the scope of the subpoena. We would like to ensure that the process is as efficient as possible for Rembrandt.

Thank you,

~Justin

**Justin S. Cohen | Holland & Knight**  
Direct 214.969.1211 | Cell 214.605.1993  
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**From:** Derek Wood <[wood@rembrandtip.com](mailto:wood@rembrandtip.com)>  
**Sent:** Friday, August 19, 2022 11:24 AM  
**To:** Cohen, Justin S (DFW - X61211) <[Justin.Cohen@hklaw.com](mailto:Justin.Cohen@hklaw.com)>  
**Cc:** Sandra Taylor <[Taylor@rembrandtip.com](mailto:Taylor@rembrandtip.com)>; Michael Johnson <[Johnson@rembrandtip.com](mailto:Johnson@rembrandtip.com)>  
**Subject:** Re: Purdue v. STMicro subpoena

*[External email]*

Hi Justin,

I just called you again but did not leave a voice mail this time. I assume that Rembrandt's request for a one month extension to respond to the subpoena in the Purdue matter is agreeable, but would appreciate a response at your earliest convenience. I am travelling today and will be more available to discuss the matter on Monday, as needed.

Regards,

Derek

215-275-3438

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**From:** Derek Wood

**Sent:** Thursday, August 18, 2022 12:54 PM

**To:** [justin.cohen@hklaw.com](mailto:justin.cohen@hklaw.com)

**Cc:** Sandra Taylor; Michael Johnson

**Subject:** Purdue v. STMicro subpoena

Hi Justin,

I am an attorney who represents Rembrandt IP Management, LLC ("Rembrandt") on various matters. As mentioned in the voicemail I left you earlier today, Rembrandt just received a subpoena in the Purdue matter mentioned above. Due to the recent receipt of the subpoena as well as pre-existing commitments and travel schedules, Rembrandt will need an extension in order to properly respond to the subpoena and make any production. Please advise if a one month extension is possible. Obviously, the requested deposition date should be postponed accordingly, but I can't suggest a date yet as I'll need to discuss the matter further with Rembrandt - hopefully for now we can agree to postpone the deposition to a date to be determined and to occur after the subpoena response is provided.

I look forward to your response. Please copy Michael and Sandra (copied hereto) on any email replies.

Regards,

Derek Wood

215-275-3438

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